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July 20, 2004

RECEIVED

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Federal Communications Commission
Office of Secretary

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

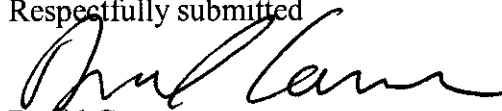
RE: Joint Petition for Waiver of the Definition of "Study Area"
of the Appendix-Glossary of Part 36 of the Commission's
Rules of Partner Communications Cooperative and Iowa
Telecommunications Services, Inc. and Petition for Waiver
of Sections 69.3(e)(11) and 69.605(c) of the Commission's
Rules, CC Docket 96-45

Dear Ms. Dortch:

Attached please find five copies of a letter dated July 16, 2004 to me from Richard A. Askoff, NECA which is provided at the request of the Commission's staff in regard to the above referenced Joint Petition filed by Partner Communications Cooperative and Iowa Telecommunications Services, Inc. on June 14, 2004

Please acknowledge receipt on the "stamp and return" duplicate document attached for this purpose. All correspondence and inquiries concerning this filing should be addressed to the undersigned.

Respectfully submitted



David Cosson

Counsel for Partner Communications Cooperative

cc: Cathy Carpino
Gary Seigel
Telecommunications Access Policy Division

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List A B C D E

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Richard A. Askoff
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July 16, 2004

David Cosson, Esq.
Kraskin, Moorman & Cosson, LLC
2120 L. Street, N.W., Suite 520
Washington, D.C. 20037

Re: Heart of Iowa Communications Cooperative and Iowa Telecommunications Services, Inc. Joint Petition for Expedited Waiver

Partner Communications Cooperative And Iowa Telecommunications Services, Inc.,
d/b/a Iowa Telecom Joint Petition for Waiver

Dear Mr. Cosson:

On February 27, 2004, at your request, NECA provided a letter to you regarding the above matter. NECA's letter affirmed that it has no objection to including within its tariff certain ILEC access lines to be acquired by Heart of Iowa Communications Cooperative ("Heart of Iowa") from Iowa Telecommunications Services, Inc. ("Iowa Telecom").

NECA's letter noted that Heart of Iowa currently provides competitive local exchange services in the area served by Iowa Telecom, and that, following consummation of the transactions described in the petition, Heart of Iowa intends to discontinue its provision of competitive services and transfer its former CLEC subscribers to its ILEC operations.

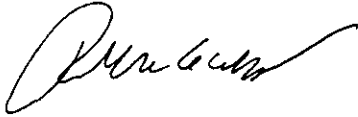
We understand that on June 14, 2004, a similar petition was filed by Partner Communications Cooperative (Partner) and Iowa Telecom seeking to delete the Baxter, Melbourne, Rhodes, and State Center exchanges from Iowa Telecom's study area and add them to Partner's study area. Partner is an ILEC serving the rural Iowa communities of Gilman and Kellogg, but also provides service as a CLEC in the Baxter and Melbourne exchanges. Partner, apparently intends to discontinue its competitive LEC operations in those exchanges and transfer those subscribers to its incumbent LEC operations, and, upon consummation of the transaction, plans to begin using NECA as its tariff pool administrator for the acquired exchanges.

Please accept this letter as assurance that NECA has no objection to inclusion of expenses, assets and revenues associated with Heart of Iowa's former CLEC operations in the exchange areas acquired from Iowa Telecom pursuant to FCC study area waiver. Similarly, NECA has no objection to inclusion of the exchanges acquired by Partner from Iowa Telecom, including expenses, assets and revenues associated with Partner's former CLEC operations in the acquired exchanges.

NECA has, however, informally requested guidance from the Commission staff as to the treatment of such expenses, assets and revenues for purposes of calculating pool settlements and collection of universal service loop cost data, and expects that treatment of data reported by Heart of Iowa and Partner for the acquired exchanges will be subject to direction by the FCC in its orders regarding the requested study area waivers, or in other related orders.

NECA looks forward to working with the companies, USAC and the Commission in clarifying reporting methods for these transactions prior to the relevant submission dates.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Askoff", with a stylized flourish at the end.

Richard A. Askoff

cc: Irene Flannery, USAC